

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

NELSON WILLIS,

Plaintiff,

vs.

ADAM M. ARON,

Defendant.

Case No.: 4:23-CV-732-ALM-KPJ

Judge Amos L. Mazzant, III

**DEFENDANT ADAM M. ARON'S MOTION FOR
PROTECTIVE ORDER AGAINST PLAINTIFF NELSON WILLIS**

Defendant Adam M. Aron makes this Motion for a Protective Order against Plaintiff Nelson Willis. Aron requests this Honorable Court to issue a Protective Order pursuant to Art. 7B.003 of the Texas Code of Criminal Procedure to prohibit Willis from engaging in conduct that constitutes criminal stalking for the duration of Willis' life. In support hereof, Aron respectfully shows the Court the following:

**I.
THE PARTIES**

1. Plaintiff Nelson Willis is a resident of Gainesville, Texas. Willis has already appeared herein pro se.

2. Defendant Adam M. Aron is a resident of the State of Kansas. He has previously appeared herein through counsel.

**II.
JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction over this Motion pursuant to 28 U.S.C. § 1367.

4. This Court has personal jurisdiction over Willis because he is a Texas resident.
5. Venue is proper in this Court under 28 U.S.C. § 1391(b)(1) as Willis resides in Cooke County, Texas, which is within this judicial district.
6. Defendant seeks only non-monetary relief.

III. FACTUAL BACKGROUND

7. Aron is the Chairman and Chief Executive Officer of AMC Entertainment Holdings, Inc. (“AMC”).

8. On April 3, 2023, using the email address “nelsonwillis3@gmail.com”¹, Willis began repeatedly sending harassing, threatening, and offensive emails to Aron and about Aron to others.² Many of the emails contain hateful speech qualifying as ethnic slurs to and about Aron. *See Business Records Affidavit*, attached hereto as Exhibit “A”.

9. Willis’ harassing, threatening, and offensive emails have only temporarily stopped because the parties have been involved in litigation.

10. Willis’ conduct constitutes stalking under Section 42.072 of the Texas Penal Code.

11. In particular, Willis has, on more than one occasion and pursuant to the same scheme or course of conduct that is directed specifically at Aron, knowingly engaged in conduct that constitutes harassment under Section 42.07 of the Texas Penal Code. Willis’ conduct has caused Aron to feel harassed, annoyed, alarmed, abused, tormented, embarrassed, and offended. *See Affidavit of Adam M. Aron*, attached hereto as Exhibit “B”. Willis’ conduct would cause a

¹ Aron has filed criminal harassment charges against Willis in Leawood, Kansas. The Leawood Police Department has confirmed with Google that the owner of this email address is Nelson Willis.

² Beginning March 15, 2023, Willis sent harassing emails about Aron to AMC’s corporate email address for investor relations.

reasonable person to feel harassed, annoyed, alarmed, abused, tormented, embarrassed, and offended.

12. Good cause exists to prohibit Willis from communicating with Aron and to prohibit Willis from sending harassing and offensive communications about Aron to others, including to other corporate mailing and email addresses of AMC and to the Securities and Exchange Commission (“SEC”).

**IV.
PROTECTIVE ORDER**

13. Each of the foregoing paragraphs is incorporated herein by reference in the following requested relief.

14. As shown by the facts set forth above and in the evidence attached hereto, there are reasonable grounds to believe that Aron is the victim of stalking.

15. After notice and hearing, Aron requests that the Court enter a Protective Order pursuant to Art. 7B.003 of the Texas Code of Criminal Procedure prohibiting Willis from the following acts:

- a. Communicating directly or indirectly with Aron in a threatening, harassing, or offensive manner;
- b. Communicating in any manner with Aron (except through Aron’s counsel or a person appointed by the Court); and
- c. Engaging in conduct directed specifically toward Aron that is reasonably likely to harass, annoy, abuse, torment, or embarrass him including, but not limited to communications about Aron to others, including to other corporate mailing and email addresses of AMC and to the SEC.

**V.
PRAYER**

WHEREFORE, PREMISES CONSIDERED, Defendant Adam M. Aron prays that upon notice and hearing the Court enter a Protective Order as requested herein and for such other and further relief at law or in equity to which he may be justly entitled.

Dated: December 8, 2023

Respectfully submitted,

By: /s/ Richard A. Illmer
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ATTORNEYS FOR DEFENDANT ADAM M. ARON

CERTIFICATE OF SERVICE

The undersigned certifies that on December 8, 2023, a true and correct copy of the foregoing document will be electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

/s/ Richard A. Illmer
Richard A. Illmer